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ETHYL CORPORATION

INTER-OFFICE

To	S. A. McWilliams	Address	Sauget
From	D. C. Bach	Address	BRT
Subject	Discharge of accumulated wash water -- 2378-TCDD	Date	Sept. 17, 1984

Enclosed is the EPA's response to our proposal to discharge the wash water possibly contaminated with 2378-TCDD. They appear to agree with our plan, but their wording may be tricky.

Let's discuss with D. E. Park at your earliest convenience.



D. C. Bach

DCB:ms
Enclosure
cc: D. E. Park (BRP)
J. Parson (BRP)

TELECOPIED



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 4 1984

Mr. David C. Bach, Esq.
Assistant Counsel, Law Department
Ethyl Corporation
Ethyl Tower
451 Florida
Baton Rouge, LA 70801

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Dear Mr. Bach:

We have reviewed your letter of June 6, 1984, notifying the Environmental Protection Agency (EPA) of your intent to dispose of materials contaminated with 2,3,7,8-tetrachloro-dibenzo-p-dioxin (2,3,7,8-TCDD). Specifically, you wish to discharge water used in decontamination of equipment and standing rain water into the sewer. We understand that the water may be contaminated with 2,3,7,8-TCDD and that, before discharge, you plan to filter the water to remove soil and other particles. We also understand that the discharged water will be sent to the Sauget, IL Publicly Owned Treatment Works (POTW).

Technically, the Dioxin Disposal Advisory Group (DDAG) has no objections to the planned disposal provided that the filtered water does not contain 2,3,7,8-TCDD above the detection limits outlined in 40 CFR Part 775 (method 3 of the "Vertac Rule"). Therefore, the DDAG recommends that the filtered water be sampled and analyzed before discharge. If, however, the filtered water contains 2,3,7,8-TCDD above the detection limits, you will not be able to discharge the effluent as planned, and you will have to submit a plan to EPA outlining its disposal. There may also be State and local regulations in effect that outline the disposal of such hazardous wastes.

If you are unable to proceed with the planned disposal, or if you choose an alternative method, please be advised that you are required to submit a new notification 60 days prior to disposing of TCDD-contaminated wastes. If you have any questions, please feel free to contact Dr. Howard Fribush, Office of Solid Waste, on (202) 382-5219.

Sincerely yours,

John A. Moore
John A. Moore, D.V.M.
Assistant Administrator
for Pesticides
and Toxic Substances